NAME OF FACILITY: McDonnell Douglas - Tract I
LOCATION: St. Louis, Mo.

EPA I.D. NO.: MOD 000 818 963
REVIEWED BY: Stephen P Burch

CONTAINER STANDARDS

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. No.	PERMIT COND. Cond. No.
1. CONDITION OF CONTAINERS 264.171 If a container holding hazardous waste is not in good condition (e.g., rusting) or if it begins to leak, the permittee must transfer the hazardous waste from this container to a container in good condition or manage the waste in another way that complies with Part 264.	Section D	Sec D not specifically required in part B however appl. and ~~part~~ inspect in general agreement			
2. COMPATIBILITY OF WASTE WITH CONTAINERS 264.172 The permittee must use a container made of or lined with materials which will not react with and are otherwise compatible with, the hazardous waste to be stored.	not required in Part B subm. page D-15 D-1a(1) Review in tech Review	Acid storage in plastic lined drums pD-15 pF-12 ★ pF-4 container stacking ht. pD-2 full drums never stacked			
3. MANAGEMENT OF CONTAINERS 264.173 A. Containers holding hazardous waste must always be closed during storage except when necessary to add or remove waste. B. A container holding hazardous waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak.		★ Double check are containers maintained in a closed fashion			
4. INSPECTIONS 264.174 At least weekly the permittee must inspect container storage areas, looking for leaking containers and for deterioration of containers and the containment system.		See Inspection Schedule			

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5. CONTAINMENT 264.175 A. A containment system must be designed and operated as follows: (i) A base must underly the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills and accumulated precipitation until the collected material is detected and removed. (ii) Base must be sloped or containment system must be designed and operated to drain and remove liquids from leaks, spills or precipitation unless containers are elevated or protected from contact with accumulated liquids. iii) Containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be included in this determination. iv) Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity, in addition to that required in (ii) to contain any run-on which might enter the system. (v) Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection system in a timely manner as is necessary, to prevent overflow of the collection system.	Check during Tech. Review	asphalt over concrete pD-16 * Is area sloped to sump to prevent container siting in liq pD-16 Run on prevented curbed storage * How often sump inspected and liquid removed			

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B. Storage areas for containers holding wastes that do not contain free liquids need not have a containment system, provided: (i) The storage area is sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation, or ( ) Containers are elevated or protected from contact with accumulated liquid.	Tech Review	Designed for free liquids.			
6. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE 264.176 Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line.		see fig B-1			
7. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES 264.177 A. Incompatible wastes or incompatible wastes and materials must not be placed in the same container unless 264.17(b) (requires taking precautions to prevent reactions) is complied with.	page D-2	Stored separately CN^- and $S^=$ stored uphill from acid in separate storage area			
B. Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material.		different type containers			
C. A storage container holding hazardous waste that is incompatible with any waste or other material stored nearby in other containers, open tanks, piles or surface impoundments must be separated from the other	page D-2	satisfactory			

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materials or protected from them by means of a dike, berm, wall or other device.	Tech Review				
8. CLOSURE 264.178 At closure, all hazardous waste and hazardous waste residue must be removed from the containment system. Containers, liners, bases and soil contaminated with hazardous waste or hazardous waste residues must be decontaminated or removed.		Closure - p-I-3			
9. CONTAINMENT SYSTEM DESIGN 122.25(b)(1) A. The permittee must demonstrate compliance with 264.175 by providing the following: (i) Description of containment system including:	pages D-2 thru D-18	Acid/base - 630 ft³ + 26 = 656 ft³ cap; est drum storage 823 ft³ of liq			
(ii) Basic design parameters, dimensions and materials of construction.	Fig. D-1 and D-2 ok containment vol. ? Need better description for this ☆	Solvent, oil, etc. - 1120 + 26 = 1146 ft³ cap; est drum storage 1647 ft³ of liq			
(iii) How design promotes drainage or how containers are kept from contact with standing liquids in containment system.		cyanide/sulfide - 50 ft³ + 6 = 56 ft³; est liq storage 228 ft³			
(iv) Capacity of containment system relative to number and volume of containers to be stored.	D-16 and D-17, page →	check ok			
(v) Provisions for preventing or managing run-on.	p. D-17	sump and curb			
(vi) How accumulated liquids can be analyzed and removed to prevent overflow.	p. D-17	p D-18			
B. For storage areas that store containers that do not contain free liquids, a demonstration of compliance with 264.175(c) including: (i) Test procedures and results or documentation to show that the wastes do not contain free liquids.	p D-18 storage in free liquid areas → visual inspection not adequate	storage designed for containers with liquids			

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Containment Design

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(ii) Description of how storage area is designed or operated to drain or remove liquids or how containers are kept from contact with standing liquids.	p. D-18 all storage at same location	sump collection proper drainage?			
C. Sketches, drawings or data demonstrating compliance with 264.176 (buffer zone for ignitable or reactive waste) and 264.177(c) (location of incompatible waste), where applicable.	p. D-18	fig B-1			
D. Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with 264.177(a) and (b) (incompatible waste) and 264.17(b) and (c) (general requirements).	incompatibles separated	pC-2 para I			